

IN THE DRAWINGS

Please verify that the *replacement* formal drawings filed *September 13, 2001* have been correctly entered into the PTO file and have been approved. (The August 2, 2004 Office Action indicated approval of the drawings filed May 21, 2001 but not of the more recently filed replacement drawings.)

REMARKS

Claims 1-23 remain pending in the application.

By the foregoing Amendment, independent Claims 1, 16 and 20 are amended to clarify certain features of the invention. Many dependent claims are amended to be consistent with Claims 1, 16, and 20. These changes are believed not to introduce new matter, and entry of the Amendment is respectfully requested.

Based on the above Amendment and the following Remarks, Applicant respectfully requests that the examiner reconsider all outstanding objections and rejections, and withdraw them.

The August 2, 2004 Office Action

In the Office Action dated August 2, 2004, the examiner approved the drawings filed May 21, 2001, objected to the Abstract, and rejected all claims based on one or more of U.S. Patent No. 6,563,914 (Sammon *et al.*), U.S. Patent No. 5,995,608 (Detampel *et al.*), U.S. Patent No. 6,101,532 (Horibe *et al.*), and U.S. Patent No. 5,745,711 (Kitahara *et al.*).

The Drawings

Applicants request that the examiner verify that the **replacement** formal drawings filed **September 13, 2001** have been correctly entered into the PTO file and are approved. (The August 2, 2004 Office Action indicated approval of the drawings filed May 21, 2001, but not of the more recently filed **replacement** drawings.)

Objection to the Specification

The examiner has objected to the Abstract as repeating the title.

Applicants have amended the Abstract so that it no longer repeats the title. Accordingly, reconsideration and withdrawal of the objection are respectfully requested.

Rejections under 35 U.S.C. §§ 102, 103

Independent Claims 1 and 20 (and certain dependent claims) were rejected under 35 U.S.C. § 102(e) as being anticipated by Sammon *et al.*. Independent Claim 16 (and certain

dependent claims) were rejected under 35 U.S.C. § 103 as being anticipated by Sammon *et al.* in view of Detampel *et al.* Dependent claims 13-15 were rejected based on a combination of Sammon *et al.* with Horibe *et al.* or Kitahara *et al.*

Applicants have amended the independent claims to more distinctly recite certain features of the claimed system. In particular, Claim 1, which is indicative of Claims 16 and 20, now recites:

1. (Currently Amended) A system for facilitating sequenced communications to members of a defined group, the system comprising:
an application interface implemented in software and accessible to a user connected to a telecommunication network,
wherein the interface is configured to enable the user to initiate a single communication session and, ***under user control***, to sequentially step the user through ***plural mutually distinct communications*** in the single communication session to plural respective members in the defined group, without the user having to initiate separate communication sessions for each said member. (emphasis added)

Claim 1 (amended) requires that the interface enables the user to initiate a single communication system, as well as to sequentially step the user through plural mutually distinct communications in the single communication session. Emphatically, the communications in the single communication session are mutually distinct, and correspond to plural respective members in a defined group.

In contrast to Applicants' claims, the Sammon *et al.* patent and discloses a teleconferencing method and system. As is well understood in the art, a teleconference involves simultaneous communication among plural users. See, for example, column 5, lines 13-21 of the Sammon *et al.* patent. However, Claim 1 recites that the plural communications be mutually distinct (believed to be clearer than the "separate" as originally stated). Thus, while the Sammon *et al.* patent may appear to have a superficial similarity to the disclosed invention (comparing Sammon's FIG. 2 with Applicants' FIG. 4), in fact the teleconferencing arrangement disclosed in the Sammon *et al.* patent does not fall within the scope of Claim 1 as clarified above. The Sammon *et al.* patent does not disclose, teach, or suggest the claimed interface which enables a user to initiate a single communication session and, under user control, to sequentially step the user through plural mutually distinct communications in the single communication session.

The Detampel *et al.* patent is cited for its teaching of a database, as recited in Independent Claim 16. Accordingly, the Detampel *et al.* patent does not overcome the shortcomings of the Sammon *et al.* patent in the context of the present invention. Accordingly, Claim 16 should be allowable.

Independent Claim 20 should be allowable for the same reason that Claim 1, discussed above, is allowable.

Dependent Claims 2-15, 17-19, and 21-23 should be allowable for the same reasons that respective Claims 1, 16, and 20, discussed above, are allowable, in addition to the merits of their own recitations.

Moreover, concerning the feature of Claim 13 that the communications are not made in real time, the Office Action's briefly stated motivation to combine Horibe's messaging system with Sammon's teleconferencing does not explain how the resulting hypothetical combination would even be operative; Applicants submit that the required real time nature of Sammon's teleconferencing system and the distinctly non-real time nature of Horibe's messaging system, actually *teaches away from* combining the two references, thus rendering the rejection improper under 35 U.S.C. § 103.

Accordingly, Applicants respectfully request that the examiner allow all pending claims, and passes the case to issue.

Information Disclosure Statement

The examiner's attention is directed to the accompanying Information Disclosure Statement, presenting documents that were cited in related "method" application 09/861,742 and a foreign counterpart application. It is respectfully submitted that the present claims, as amended above, clearly and patentably distinguish the inventive system over the cited art as interpreted by the examiners in those cases. Applicants respectfully request that of the examiner fully consider and make of record the art submitted with the Information Disclosure Statement.

Change of Correspondence Address; New Associate Attorney

A "Revocation of Associate Power and Appointment of Attorney and Change of Correspondence Address" is filed herewith. The Appointment recognizes the undersigned


attorney to prosecute the case. It is requested that the examiner verify that the address information has been entered into the PTO mailing system so that future communications will be mailed to the correct address.

Conclusion

All objections and rejections have been complied with, properly traversed, or rendered moot. Thus, it now appears that the application is in condition for allowance. Should any questions arise, the examiner is invited to call the undersigned representative so that this case may receive an early Notice of Allowance.

Favorable consideration and allowance are earnestly solicited.

Respectfully submitted,

By: 

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